

EXHIBIT 6 TO JOINT PRETRIAL ORDER

BAY TEK'S EXHIBIT LIST

Bay Tek Entertainment, Inc. (“Bay Tek”) hereby submits the following list of exhibits it intends to offer at the trial in this matter, excluding exhibits to be used for purposes of rebuttal and/or impeachment. The following table includes Full Circle’s objections and basis for those objections, if any, as required by the Court’s form Joint Pretrial Order. Where many documents are objected to on substantially identical grounds, a description of the categorical objections follows the table.

Bay Tek reserves the right to amend and/or supplement this list as necessary.

Ex.	Document Description	Objection	Basis for Objection
_A	Confidential Settlement Agreement between Skee Ball, Inc. and Full Circle United, LLC (FCU000000024-FCU000000038)	No Objection	
_B	Confidential Trademark License Agreement between Skee Ball, Inc. and Full Circle United, LLC (FCU000000052-FCU000000074)	No Objection	
_C	Assignment and Assumption Agreement between Skee Ball, Inc. and Bay Tek Games, Inc.	No Objection	

Ex.	Document Description	Objection	Basis for Objection
_D*	Email thread between T. Diedrich, Lance Treankler, H. Hampton, Larry Treankler, Leadership Team, E. Schadrie, J. Bonnin, E. Pavony, and E. Wikman regarding NSBL Investment (BT0004504-BT0004505)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
_E*	Email thread between T. Diedrich, M. Connell, Lance Treankler, H. Hampton, M. Connell, E. Pavony, and E. Wikman regarding Scheduling call for this week-vetting of financials (BT0004680-BT0004689)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
_F*	Email thread between T. Diedrich, M. Connell, Lance Treankler, H. Hampton, M. Connell, E. Pavony, and E. Wikman regarding Scheduling call for this week-vetting of financials (BT0004698-BT0004702)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
_G*	Email with attachment from T. Diedrich to E. Pavony, M. Connell, H. Hampton and L. Treankler regarding Intent to Manufacture (BT0002021-BT0002022)	No Objection	
_H*	Email thread between E. Wikman and J. Hines (Firestone Financial) regarding Contact Info (FCU000010267-FCU000010271)	No Objection	

* Bay Tek intends to withdraw exhibits denoted with an (*) if the Court grants in its entirety Bay Tek's Motion *In Limine* to Exclude Evidence Offered to Seek to Establish a Contractual Obligation of Bay Tek to Manufacture Custom Lanes for FCU (See ECF No. 240)

Ex.	Document Description	Objection	Basis for Objection
_I*	Email from E. Wikman to T. Diedrich, CC H. Hampton, E. Schadrie, R. Rochetti and E. Pavony regarding New Scope of Work (BT0009210)	No Objection	
_J*	Email thread between H. Hampton, E. Pavony and E. Wikman regarding Beer Ball Operators (BT0005208-BT0005211)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
_K	Email thread between E. Pavony and Eric Bruner, Adam Fletcher, E. Wikman and Brooks Chambers (FCU000014898-FCU000014907)	No Objection	
_L	Email thread between E. Wikman, E. Pavony, and R. Cooper regarding WHOOP, THERE IT IS!!! (FCU000015294-FCU000015296)	Foundation, Relevance	It is unclear how this document relates to any remaining claim.
_M	Email from P. Scanlan to E. Pavony, E. Wikman, R. Cooper, and E. Schadrie regarding Next setps on Skee Ball LIVE	No Objection	
_N	Facebook post by Eric Pavony of Skee-Ball Live lanes in Brooklyn	No Objection	
_O	Email from E. Pavony to E. Pavony regarding Brooklyn Brewskee-Ball-Week 3 Skee Mail! (FCU000015457-FCU000015461)	No Objection	
_P	Email from Twitch Support to E. Pavony regarding [Twitch] Your Application has been Accepted! (FCU000015627-FCU000015628)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
_Q	Email thread with attachments from E. Pavony to E. Brunner regarding Follow up (FCU000015693-FCU000015698)	No Objection	
_R	Email from E. Pavony to Brooklyn Brewskee-Ball, CC R. Lynch, R. Dexter, R. Talbert, C. Long, P. O'Neill, N. Ronayne, J. Gregg, tokimturner@gmail.com, markdnathan@gmail.com, vc.cookies@gmail.com, C. Lynd, R. Dodge, R. Cooper, and E. Wikman regarding Welcome to LANESANITY! (FCU000015762-FCU000015764)	No Objection	
_S	Email from Brooklyn Brewskee-Ball to E. Pavony regarding Tomorrow is LANESANITY! (FCU000015807-FCU000015813)	No Objection	
_T	Email thread between E. Pavony and A. Naslund, CC A. Soriano, A. Naslund, A. Berrones, and A. St. Germain, regarding External Front Page Request - National Skeeball League LIVE (FCU000015821-FCU000015825)	No Objection	
_U	Email with attachments from E. Cooper to S. Oehrlein and E. Wikman regarding Week 1 Schedule and Skeemail (FCU000015850-FCU000015857)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
_V	Email thread between Bill Clark and E. Pavony regarding NSBL and Skee-Ball Live (FCU000008715-FCU000008716)	No Objection as to email, but video links need to be refreshed. https://fb.watch/xeDPRfouq4/ https://drive.google.com/file/d/11VO-jCso0MjfHq3sMIVEgAOcDeog5ftC/view	
_W	Email thread between Stephen Lahti and E. Pavony regarding Bar Partners & National Skee-Ball League (FCU000008730-FCU000008740)	No Objection as to email, but video links need to be refreshed. https://fb.watch/xeDPRfouq4/ https://drive.google.com/file/d/11VO-jCso0MjfHq3sMIVEgAOcDeog5ftC/view	
_X	Email thread between E. Pavony and E. Wikman regarding Reasoning and Plan for Press We Discussed (FCU000016077)	Relevance	It is unclear how this document relates to any remaining claim.
_Y	Email from Brooklyn Brewskee-Ball to E. Pavony regarding Register for Summer Skeeson Brewskee-Ball (Week 1 Schedule) (FCU000016086-FCU000016094)	No Objection	
_Z	Email from E. Pavony to E. Pavony regarding Congratulations to this Season's Winners! BEEB Dates Announced! (FCU000016354-FCU000016361)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
AA	Email thread between Steve Marzocca (Twitch) and E. Pavony regarding Skee-Ball on Twitch (FCU000016464-FCU000016467)	No Objection	
AB	Email from P. Coffey to E. Pavony regarding BayTek Entertainment/Full Circle (FCU000005627-FCU000005628)	Foundation, Relevance; Hearsay	The document is an email from BayTek's counsel. It is an out of court statement from a party lacking personal knowledge to which no hearsay exception applies.
AC	Facebook post by NSBL with video titled, "Folks new to the lanecast on Sunday wanted to know what Skee-Ball LIVE is all about. Here's a brief discussion about the "Lane of the Future: and its..."	Relevance	It is unclear how this document relates to any remaining claim.
AD	Email thread between E. Pavony and Johanna R. Goldblatt (ESPN) regarding Brewskee-Ball & ESPN (FCU000009722-FCU000009724)	No Objection	
AE	Email thread between E. Pavony and Johanna R. Goldblatt (ESPN) regarding Update (FCU000009726)	No Objection	
AF	Email with attachments from H. Hampton to E. Pavony regarding Request for Quote (FCU000002974-FCU000002982)	No Objection	
AG	Facebook post by NSBL advertising NSBL Skee-Ball LIVE tournaments	No Objection	

Ex.	Document Description	Objection	Basis for Objection
AH	Email thread between Johanna R. Goldblatt (ESPN) and E. Pavony regarding ESPN Production Guidelines (FCU000009807-FCU000009808)	No Objection	
AI	Facebook post by NSBL advertising Skee-Ball LIVE on Twitch	No Objection	
AJ	Email from Johanna R. Goldblatt (ESPN) to E. Pavony regarding Draft of ESPN + NSBL Deal Points (FCU000009814-FCU000009816)	No Objection	
AK	Email with attachment from Johanna R. Goldblatt (ESPN) to E. Pavony, CC C. Shoemaker regarding Air Hockey + ESPN Deal Points (FCU000009829-FCU000009845)	No Objection	
AL	Email thread with attachments between Johanna R. Goldblatt (ESPN) and E. Pavony regarding NSBL 1+ ESPN Deal Points (FCU000009929-FCU000009970)	No Objection	
AM	Letter from P. Thanadesis to BayTek Entertainment dated 2/12/2020; with cover email	No Objection	
AN	Email thread between P. Thanadesis, D. Timm, CC P. Coffey, J. Swiekatowski and C. Casadonte-Apostolou regarding Full Circle United/ESPN	No Objection	

Ex.	Document Description	Objection	Basis for Objection
AO	Email thread between P. Thanasides, P. Coffey, C. Casadonte-Apostolou and all CL Staff regarding Full Circle United/Bay Tek Entertainment	No Objection	
AP	Email thread between P. Coffey, P. Thanasides, CC A. Fisher and D. Timm regarding Bay Tek/Full Circle	No Objection	
AQ	Email thread between Johanna R. Goldblatt (ESPN) and E. Pavony regarding NSBL 1+ ESPN Deal Points (FCU000010028-FCU000010038)	No Objection	
AR	Website Printout: Scoreboards and Full Circle Magazine Covers (BT0000070-BT0000091)	No Objection	
AS	Email with attachment from P. Coffey to P. Thanasides dated March 11, 2020 regarding Full Circle United/Bay Tek	No Objection	
AT	Facebook post by Full Circle Bar with Skee-Ball machines	No Objection	
AU	Email thread between E. Pavony and Alex Garra (American Bocce Co) regarding Great Clip on Insta! (FCU000018337-FCU000018339)	No Objection	
AV	Website Printout: Asheville Website (BT0000113-BT0000116)	Foundation; Relevance	See Objection One
AW	Website Printout: Brooklyn Website (BT0000143-BT0000148)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
AX	Website Printout: Oakland Website (BT0000168-BT0000175)	Foundation; Relevance	<i>See Objection One</i>
AY	Website Printout: Brewskeeball Products (BT0000065-BT0000069)	No Objection	
AZ	Website Printout: Hepatitis Skee Merchandise (BT0000096-BT0000098)	No Objection	
BA	Full Circle Magazine: Phillskoo Phanatics (BT0000102)	No Objection	
BB	Letter from J. Movit to Jon R. Fetterolf, Esq. dated 9/23/2020	No Objection	
BC	Website Printout: Brewskeeball-Philadelphia (FCU000020350- FCU000020352)	Foundation; Relevance	<i>See Objection One</i>
BD	Website Printout: Gainesville Website (BT0000276-BT0000282)	Foundation; Relevance	<i>See Objection One</i>
BE	Website Printout: San Francisco Website (BT0000307-BT0000324)	Foundation; Relevance	<i>See Objection One</i>
BF	Screenshots of Twiith Videos related to NSBL (BT0000426-BT0000445)	No Objection	
BG	Website Printout: Facebook Full Circle Bar Post	No Objection	
BH	Website Printout: Facebook Full Circle Bar Post	No Objection	
BI	Forensic Collection: Instagram Post--Full Circle Bar Brooklyn on Instagram: "Ahoy! Here's the Week 1 Match Schedule ya'll. Let the Fall Skeeson commence! There's still plenty of time to register for the upcoming..." (BT0010859-BT0010863)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
BJ	Forensic Collection: Instagram Post--Extra Positive Land on Instagram: "Skeeson 47 began at FCB this week, as rookie and veteran rollers got back in the Brew York Groove. Congrats to Lex-skee, Killapino and..." (BT0010864-BT0010866)	No Objection	
BK	Forensic Collection: Instagram Post--Extra Positive Land on Instagram: "We mashed. We bashed. We smashed. Halloweek in Brooklyn was spooky and kooky D Here are the Top TEAM Costumes. Please Vote for ONE of ... " (BT0010867-BT0010874)	No Objection	
BL	Forensic Collection: Instagram Post--Extra Positive Land on Instagram: "Rollers, mount up! Championship Sunday 47 is tomorrow. Here's the Championship Sunday Program, Updated BMT Bracket and Round 1 & 2 Match ... " (BT0010875-BT0010879)	No Objection	
BM	Forensic Collection: Instagram Post--Extra Positive Land on Instagram: "Post-Skeeson begins tonite in Brooklyn with The BMT #goodluck #godskeed #everyballcounts #brewskeeball" (BT0010880-BT0010883)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
BN	Forensic Collection: Instagram Post--Full Circle Bar Brooklyn on Instagram: 'The Final Week of the Regular Skeeson Hath Commeth! Here are the WEEK 8 Match Schedules and some Post-Skeeson details, as we gear up for..." (BT0010888-BT0010892)	No Objection	
BO	Forensic Collection: Instagram Post--Extra Positive Land on Instagram: "Amidst the sea of flannel shirts and cider, rollers and teams posted some sweet scores on Week 3. Congrats to Torstein from Cloudy with a... ." (BT0010893-BT0010895)	No Objection	
BP	Full Circle Bar's Website - Austin Location	No Objection	
BQ	Facebook page of NSBL	No Objection	
BR	WebCapture: NSBL - Twitch	No Objection	
BS	WebCapture: About NSBL - Twitch	No Objection	
BT	WebCapture: NSBL's Schedule - Twitch	No Objection	
BU	WebCapture: NSBL's Videos- Twitch	No Objection	
BV	WebCapture: All Products - Page 2 - Spinagogue	No Objection	
BW	Website Printout: Los Angeles Website	Foundation; Relevance	See Objection One
BX	Website Printout: Los Angeles Website - Photo 1	Foundation; Relevance	See Objection One
BY	Website Printout: Los Angeles Website - Photo 2	Foundation; Relevance	See Objection One
BZ	Website Printout: Los Angeles Website - Photo 3	Foundation; Relevance	See Objection One
CA	Website Printout: Los Angeles Website - Photo 4	Foundation; Relevance	See Objection One
CB	Website Printout: Los Angeles Website - Photo 5	Foundation; Relevance	See Objection One

Ex.	Document Description	Objection	Basis for Objection
CC	Intentionally Omitted	No Objection	
CD	Full Circle United's Sixth Month Revenue Report to Bay Tek; January 1, 2016 - June 30, 2016	No Objection	
CE	Full Circle United's Sixth Month Revenue Report to Bay Tek; July 1, 2016 - December 31, 2016	No Objection	
CF	Full Circle United's Sixth Month Revenue Report to Bay Tek; January 1, 2017 - June 30, 2017	No Objection	
CG	Email thread between E. Pavony and Brooklyn World Mug regarding BK BEEB Team Sponsor (FCU000016558-FCU000016561)	No Objection	
CH	Full Circle United's Sixth Month Revenue Report to Bay Tek; July 1, 2018 - December 31, 2018 (FCU000016764-FCU000016767)	No Objection	
CI	Email from E. Pavony to D. Timm, CC H. Hampton regarding Sponsorships (FCU000002947)	No Objection	
CJ	Email with attachments from E. Pavony to H. Hampton regarding 2019 Revenue Report (July 1-December 31) (FCU000002987-FCU000002991)	No Objection	
CK	Full Circle United's Revenue Report to Bay Tek; May & June 2020; Full Circle United's Sixth Month Revenue Report to Bay Tek; January 1, 2020 - June 30, 2020 (FCU000018310-FCU000018315)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
CL	Full Circle United's Revenue Report to Bay Tek; December 2020; Full Circle United's Sixth Month Revenue Report to Bay Tek; July 1, 2020 - December 31, 2020 (FCU000003041-FCU000003045)	No Objection	
CM	Full Circle United's Sixth Month Revenue Report to Bay Tek; July 1, 2021 - December 31, 2021 (FCU000020471-FCU000020475)	No Objection	
CN	Full Circle United's Sixth Month Revenue Report to Bay Tek; January 1, 2022 - June 30, 2022	No Objection	
CO	Full Circle United's 2023 Six Month Revenue Report to Bay Tek; July 1, 2023 – December 31, 2023	No Objection	
CP	Full Circle United's 2024 Six Month Revenue Report to Bay Tek; January 1, 2024 – June 30, 2024	No Objection	
CQ	Receipts for domains (FCU EXPERT 0001098-FCU EXPERT 0001120)	Relevance	It is unclear how this document relates to the remaining claims.
CR	2014 Chase Bank Statements for Full Circle United LLC (FCU000007059-FCU000007132)	Cumulative/Waste of Time; Relevance	<i>See Objection Two</i>
CS	2015-2016 Chase Bank Statements for Full Circle United LLC (FCU000007133-FCU000007212)	Cumulative/Waste of Time; Relevance	<i>See Objection Two</i>
CT	University Federal Credit Union for Eric Cooper (FCU000007679-FCU000007697)	Cumulative/Waste of Time; Relevance	<i>See Objection Two</i>

Ex.	Document Description	Objection	Basis for Objection
CU	2018-2021 Chase Bank Statements for Full Circle United LLC (FCU000005399-FCU000005546)	Cumulative/Waste of Time; Relevance	<i>See Objection Two</i>
CV	Report: Information regarding Model S Lanes/non-Skee Ball Live Lanes (FCU EXPERT 0000002-FCU EXPERT 0000004)	No Objection	
CW	Report: FCU Lane Data for Laura (FCU EXPERT 0000966)	No Objection	
CX	Eric Pavony's Amended Answers to Bay Tek Entertainment, Inc.'s First Set of Interrogatories to Eric Pavony	Relevance	<i>See Objection Three</i>
CY	Full Circle United LLC's Amended Answers to Bay Tek Entertainment Inc.'s First Set of Interrogatories to Full Circle United LLC	Relevance	<i>See Objection Three</i>
CZ	Eric Pavony's Amended Responses to Second Set of Requests for Admission of Bay Tek Entertainment, Inc.	Relevance	<i>See Objection Three</i>
DA	Plaintiff/Counterclaim Defendant Full Circle United, LLC's Amended Answers to Defendant/Counterclaim Plaintiff Bay Tek Entertainment, Inc.'s Second Set of Interrogatories	Relevance	<i>See Objection Three</i>
DB	Counterclaim Defendant Eric Pavony's Amended Answers to Defendant Counterclaim Plaintiff Bay Tek Entertainment, Inc.s' Second Set of Interrogatories	No Objection	

Ex.	Document Description	Objection	Basis for Objection
DC	Plaintiff/Counterclaim Defendant Full Circle United, LLC's Amended Answers to Defendant/Counterclaim Plaintiff Bay Tek Entertainment, Inc.'s Second Set of Interrogatories	Relevance; Prejudice; Confusion	The interrogatory asks for a legal conclusion concerning the parties contractual rights, including claims no longer in this case.
DD	Full Circle United, LLC's and Eric Pavony's Memorandum in Support of Motion for Clarification or Reconsideration	Foundation; Relevance; Hearsay	The document is a legal memorandum containing factual representations by counsel who lack personal knowledge and legal arguments not properly put before the jury.
DE	U.S. trademark registrations for the word mark for AC DC	No Objection	
DF	U.S. trademark registrations for the word mark for BEYONCE	No Objection	
DG	U.S. trademark registrations for the word mark for G.I. JOE	No Objection	
DH	U.S. trademark registrations for the word mark for PUSSYCAT DOLLS	No Objection	
DI	U.S. trademark registrations for the word mark for SHANG-CHI	No Objection	
DJ	U.S. trademark registrations for the word mark for TEENAGE MUTANT NINJA TURTLES	No Objection	
DK	U.S. trademark registrations for the word mark for RAGE AGAINST THE MACHINE	No Objection	
DL	U.S. trademark registrations for the word mark for THE FORCE AWAKENS	No Objection	
DM	U.S. trademark registrations for BUZZBALLZ marks	No Objection	
DN	U.S. trademark registrations for APEROL marks	No Objection	

Ex.	Document Description	Objection	Basis for Objection
DO	U.S. trademark registrations for the mark MILLER HIGH LIFE	No Objection	
DP	U.S. trademark registrations for the word mark for WILD TURKEY	No Objection	
DQ	USPTO Reel: 005752 Frame No. 0285 - 0289	No Objection	
DR	Email thread with attachments between E. Schadrie, T. Diedrich, G. Philippon, J. Fortunato, and M. Connell regarding Skee Ball, Inc. Trademark Portfolio Transfer; attaching Notice of Recordation and Trademark Assignment (BT0007931-BT0007941)	Relevance	
DS	Skee-Ball A True American Classic A Guide to Skee-Ball Licensing (BT0004430-BT0004445)	Foundation, Relevance	
DT	Skee-Ball Brand Guide (BT0007559-BT0007567)	Foundation, Relevance	
DU	U.S. Trademark Registration Certificates for Reg. No. 256,496 for SKEE-BALL	No Objection	
DV	U.S. trademark registrations for 8 SKEE-BALL No. 4,627,972	No Objection	
DW	U.S. Trademark Registration Certificate for 8 SKEE-BALL No. 4,627,972	No Objection	
DX	U.S. Trademark Registration Certificate for SKEE-BALL No. Reg. No. 5,429,760	No Objection	
DY	U.S. Trademark Registration Certificate for SKEE-BALL PLUS No. Reg. No. 5,499,619	No Objection	

Ex.	Document Description	Objection	Basis for Objection
DZ	U.S. Trademark Registration Certificate for SKEE-BALL LIVE No. Reg. No. 5,657,039	No Objection	
EA	U.S. trademark registrations for No. 6,389,191	No Objection	
EB	U.S. Trademark Registration Certificate for SKEE-BALL No. Reg. No. 6,520,809	No Objection	
EC	U.S. Trademark Registration Certificate for SKEE-BALL No. Reg. No. 6,912,996	No Objection	
ED	Internet Archive - Declaration of Nathaniel E. Frank-White	Foundation; Relevance; Hearsay	See Objection One
EE*	Email thread between H. Hampton, A. Heck and R. Rochetti regarding Beer Ball Operators (BT0005206-BT0005207)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
EF*	Email thread between M. Johnson and E. Schadrie and W. Jensen regarding NUC (BT0005556-BT0005557)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
EG*	Email with attachment from T. Diedrich to H. Hampton and Larry Treankler regarding NSBL Background (BT0004879-BT0004880)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
EH	Email thread between H. Hampton and R. Rochetti regarding FCU (BT0008700-BT0008701)	Foundation; Hearsay; Relevance	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
EI	Intentionally Omitted		
EJ	Intentionally Omitted		
EK	Intentionally Omitted		
EL	Intentionally Omitted		
EM	Intentionally Omitted		

Ex.	Document Description	Objection	Basis for Objection
EN	Intentionally Omitted		
EO	Intentionally Omitted		
EP	Intentionally Omitted		
EQ	Intentionally Omitted		
ER	Intentionally Omitted		
ES	Intentionally Omitted		
ET	Intentionally Omitted		
EU [†]	Video: Chug Chanting (BT0000514)	No Objection	
EV	Streams: 2017 Rollers Championship	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	See Objection Five
EW	Streams: - Lanesanity Part 1	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	See Objection Five
EX	Streams: Lanesanity Part 2	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	See Objection Five
EY	Streams: Lanesanity Part 3	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	See Objection Five
EZ	Streams: 2017 Skee-Ball Championship	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	See Objection Five
FA	Streams: 2018 Hundo Derby	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	See Objection Five
FB	Streams: 2018 World Mug Part 2	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	See Objection Five

[†] Exhibits EU-FT are videos of live broadcasts of Live Play matches on Twitch posted by Full Circle and Pavony (the “Videos”), as admitted in Full Circle’s and Pavony’s Interrogatory responses. During the meet and confer process for the previous Joint Pre-trial Order (ECF 238), Full Circle objected to the purportedly cumulative nature of these exhibits and requested Bay Tek limit the number of streams to be presented at trial or Bay Tek identify what portions of the streams would be used at trial. Bay Tek represented that, *inter alia*, the content, number, volume, and length of the Videos is necessary to prove the materiality of Full Circle’s breach that the Court has already found with respect to broadcasting. Moreover, given that each is a separate and discrete video, showing different content, the evidence is not cumulative. Notwithstanding, in an effort to streamline the trial and obviate the need for these objections, Bay Tek agreed that it would remove the Videos from the exhibit list contingent on stipulations regarding the Videos. Bay Tek then prepared a series of stipulations including: the number and titles of the Videos; the dates and locations of the events depicted in the Videos; the appearance of Mr. Pavony and the SKEE-BALL® mark in the Videos; the total overall length of the Videos; and the continued availability of the Videos. The parties continue to be unable to reach an agreement on stipulations. As a result, Bay Tek must include all Videos in their entirety on the list for the reasons described above. Recognizing the difficulties for trial, though, raised by the volume of Full Circle’s livestreaming, Bay Tek will attempt to elicit facts that the stipulations were intended to establish through examination of Full Circle’s witnesses. Full Circle continues to object to the introduction of these exhibits and will be moving *in limine* on this issue.

Ex.	Document Description	Objection	Basis for Objection
FC	Streams: Lanesanity 2	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FD	Streams: 2019 Skee-Ball National Championship Part 1	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FE	Streams: 2019 Skee-Ball National Championship Part 2	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FF	Streams: 2019 Skee-Ball National Championship Part 3	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FG	Streams: 2019 Skee-Ball National Championship Part 4	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FH	Streams: Quaranstream E01	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FI	Streams: Quaranstream E02	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FJ	Streams: Quaranstream E03	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FK	Streams: Quaranstream E04	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FL	Streams: Quaranstream E05	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FM	Streams: Quaranstream E06	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FN	Streams: Quaranstream E07	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FO	Streams: 2019 Hundo Derby Highlights	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FP	Streams: 2019 Rollers Championship – Rnd 2	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FQ	Streams: Phoenix (ATX) vs The Alskeemist (ILM) – 2019 Rollers	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>

Ex.	Document Description	Objection	Basis for Objection
FR	Streams: Serpico (BK) vs Phoenix (ATX) – 2019 Lanesanity	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FS	Streams: Floator (ATX) vs Woody (CGN) – 2019 Rollers	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FT	Streams: L Train (BK) vs Texas Lanesaw Massivescore (TX) – 2019 World Mug	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>

Objection One: These exhibits were downloaded from the internet. The authorship of the exhibit, when it was generated, what it depicts, whether it has been modified, and whether the author has personal knowledge any facts asserted cannot be established. To the extent authored by third parties, the document is irrelevant to the remaining claims.

Objection Two: These exhibits are lengthy bank statements. Bay Tek has identified hundreds of pages of bank statements from Plaintiff without any reference to what portions (if any) are relevant to this case. To the extent that Bay Tek intends to introduce all of Plaintiff's bank statements, that would be needlessly cumulative and a waste of time.

Objection Three: These exhibits are discovery responses containing many statements, at least some of which should not be received into evidence given the narrowed scope of the case.

Objection Four: Intentionally Omitted.

Objection Five: These exhibits are lengthy video files, each one of over twenty-six identified by Bay Tek. To the extent the file is offered for the statements it contains, they should be specifically identified to assess whether any hearsay exception applies. Plaintiff has repeatedly requested that Bay Tek indicate the portions of the videos that they intend to play, but has been rebuffed. To the extent that BayTek intends to show the jury forty-six hours of Skee-Ball videos, that would be needlessly cumulative and a waste of time. While Bay Tek proposed a set of stipulations in lieu of offering video exhibits, the parties could not reach agreement on final language, as Bay Tek sought to characterize the videos and what was done with them rather than neutrally presenting facts that could be agreed to.

EXHIBIT 6 TO JOINT PRETRIAL ORDER

BAY TEK'S EXHIBIT LIST

Bay Tek Entertainment, Inc. (“Bay Tek”) hereby submits the following list of exhibits it intends to offer at the trial in this matter, excluding exhibits to be used for purposes of rebuttal and/or impeachment. The following table includes Full Circle’s objections and basis for those objections, if any, as required by the Court’s form Joint Pretrial Order. Where many documents are objected to on substantially identical grounds, a description of the categorical objections follows the table.

Bay Tek reserves the right to amend and/or supplement this list as necessary.

Ex.	Document Description	Objection	Basis for Objection
_A	Confidential Settlement Agreement between Skee Ball, Inc. and Full Circle United, LLC (FCU000000024-FCU000000038)	No Objection	
_B	Confidential Trademark License Agreement between Skee Ball, Inc. and Full Circle United, LLC (FCU000000052-FCU000000074)	No Objection	
_C	Assignment and Assumption Agreement between Skee Ball, Inc. and Bay Tek Games, Inc.	No Objection	

Ex.	Document Description	Objection	Basis for Objection
_D*	Email thread between T. Diedrich, Lance Treankler, H. Hampton, Larry Treankler, Leadership Team, E. Schadrie, J. Bonnin, E. Pavony, and E. Wikman regarding NSBL Investment (BT0004504-BT0004505)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
_E*	Email thread between T. Diedrich, M. Connell, Lance Treankler, H. Hampton, M. Connell, E. Pavony, and E. Wikman regarding Scheduling call for this week-vetting of financials (BT0004680-BT0004689)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
_F*	Email thread between T. Diedrich, M. Connell, Lance Treankler, H. Hampton, M. Connell, E. Pavony, and E. Wikman regarding Scheduling call for this week-vetting of financials (BT0004698-BT0004702)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
_G*	Email with attachment from T. Diedrich to E. Pavony, M. Connell, H. Hampton and L. Treankler regarding Intent to Manufacture (BT0002021-BT0002022)	No Objection	
_H*	Email thread between E. Wikman and J. Hines (Firestone Financial) regarding Contact Info (FCU000010267-FCU000010271)	No Objection	

* Bay Tek intends to withdraw exhibits denoted with an (*) if the Court grants in its entirety Bay Tek's Motion *In Limine* to Exclude Evidence Offered to Seek to Establish a Contractual Obligation of Bay Tek to Manufacture Custom Lanes for FCU (See ECF No. 240)

Ex.	Document Description	Objection	Basis for Objection
_I*	Email from E. Wikman to T. Diedrich, CC H. Hampton, E. Schadrie, R. Rochetti and E. Pavony regarding New Scope of Work (BT0009210)	No Objection	
_J*	Email thread between H. Hampton, E. Pavony and E. Wikman regarding Beer Ball Operators (BT0005208-BT0005211)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
_K	Email thread between E. Pavony and Eric Bruner, Adam Fletcher, E. Wikman and Brooks Chambers (FCU000014898-FCU000014907)	No Objection	
_L	Email thread between E. Wikman, E. Pavony, and R. Cooper regarding WHOOP, THERE IT IS!!! (FCU000015294-FCU000015296)	Foundation, Relevance	It is unclear how this document relates to any remaining claim.
_M	Email from P. Scanlan to E. Pavony, E. Wikman, R. Cooper, and E. Schadrie regarding Next setps on Skee Ball LIVE	No Objection	
_N	Facebook post by Eric Pavony of Skee-Ball Live lanes in Brooklyn	No Objection	
_O	Email from E. Pavony to E. Pavony regarding Brooklyn Brewskee-Ball-Week 3 Skee Mail! (FCU000015457-FCU000015461)	No Objection	
_P	Email from Twitch Support to E. Pavony regarding [Twitch] Your Application has been Accepted! (FCU000015627-FCU000015628)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
_Q	Email thread with attachments from E. Pavony to E. Brunner regarding Follow up (FCU000015693-FCU000015698)	No Objection	
_R	Email from E. Pavony to Brooklyn Brewskee-Ball, CC R. Lynch, R. Dexter, R. Talbert, C. Long, P. O'Neill, N. Ronayne, J. Gregg, tokimturner@gmail.com, markdnathan@gmail.com, vc.cookies@gmail.com, C. Lynd, R. Dodge, R. Cooper, and E. Wikman regarding Welcome to LANESANITY! (FCU000015762-FCU000015764)	No Objection	
_S	Email from Brooklyn Brewskee-Ball to E. Pavony regarding Tomorrow is LANESANITY! (FCU000015807-FCU000015813)	No Objection	
_T	Email thread between E. Pavony and A. Naslund, CC A. Soriano, A. Naslund, A. Berrones, and A. St. Germain, regarding External Front Page Request - National Skeeball League LIVE (FCU000015821-FCU000015825)	No Objection	
_U	Email with attachments from E. Cooper to S. Oehrlein and E. Wikman regarding Week 1 Schedule and Skeemail (FCU000015850-FCU000015857)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
_V	Email thread between Bill Clark and E. Pavony regarding NSBL and Skee-Ball Live (FCU000008715-FCU000008716)	No Objection as to email, but video links need to be refreshed. https://fb.watch/xeDPRfouq4/ https://drive.google.com/file/d/11VO-jCso0MjfHq3sM1vEgAOcDeog5ftC/view	
_W	Email thread between Stephen Lahti and E. Pavony regarding Bar Partners & National Skee-Ball League (FCU000008730-FCU000008740)	No Objection as to email, but video links need to be refreshed. https://fb.watch/xeDPRfouq4/ https://drive.google.com/file/d/11VO-jCso0MjfHq3sM1vEgAOcDeog5ftC/view	
_X	Email thread between E. Pavony and E. Wikman regarding Reasoning and Plan for Press We Discussed (FCU000016077)	Relevance	It is unclear how this document relates to any remaining claim.
_Y	Email from Brooklyn Brewskee-Ball to E. Pavony regarding Register for Summer Skeeson Brewskee-Ball (Week 1 Schedule) (FCU000016086-FCU000016094)	No Objection	
_Z	Email from E. Pavony to E. Pavony regarding Congratulations to this Season's Winners! BEEB Dates Announced! (FCU000016354-FCU000016361)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
AA	Email thread between Steve Marzocca (Twitch) and E. Pavony regarding Skee-Ball on Twitch (FCU000016464-FCU000016467)	No Objection	
AB	Email from P. Coffey to E. Pavony regarding BayTek Entertainment/Full Circle (FCU000005627-FCU000005628)	Foundation, Relevance; Hearsay	The document is an email from BayTek's counsel. It is an out of court statement from a party lacking personal knowledge to which no hearsay exception applies.
AC	Facebook post by NSBL with video titled, "Folks new to the lanecast on Sunday wanted to know what Skee-Ball LIVE is all about. Here's a brief discussion about the "Lane of the Future: and its..."	Relevance	It is unclear how this document relates to any remaining claim.
AD	Email thread between E. Pavony and Johanna R. Goldblatt (ESPN) regarding Brewskee-Ball & ESPN (FCU000009722-FCU000009724)	No Objection	
AE	Email thread between E. Pavony and Johanna R. Goldblatt (ESPN) regarding Update (FCU000009726)	No Objection	
AF	Email with attachments from H. Hampton to E. Pavony regarding Request for Quote (FCU000002974-FCU000002982)	No Objection	
AG	Facebook post by NSBL advertising NSBL Skee-Ball LIVE tournaments	No Objection	

Ex.	Document Description	Objection	Basis for Objection
AH	Email thread between Johanna R. Goldblatt (ESPN) and E. Pavony regarding ESPN Production Guidelines (FCU000009807-FCU000009808)	No Objection	
AI	Facebook post by NSBL advertising Skee-Ball LIVE on Twitch	No Objection	
AJ	Email from Johanna R. Goldblatt (ESPN) to E. Pavony regarding Draft of ESPN + NSBL Deal Points (FCU000009814-FCU000009816)	No Objection	
AK	Email with attachment from Johanna R. Goldblatt (ESPN) to E. Pavony, CC C. Shoemaker regarding Air Hockey + ESPN Deal Points (FCU000009829-FCU000009845)	No Objection	
AL	Email thread with attachments between Johanna R. Goldblatt (ESPN) and E. Pavony regarding NSBL 1+ ESPN Deal Points (FCU000009929-FCU000009970)	No Objection	
AM	Letter from P. Thanadesis to BayTek Entertainment dated 2/12/2020; with cover email	No Objection	
AN	Email thread between P. Thanadesis, D. Timm, CC P. Coffey, J. Swiekatowski and C. Casadonte-Apostolou regarding Full Circle United/ESPN	No Objection	

Ex.	Document Description	Objection	Basis for Objection
AO	Email thread between P. Thanasides, P. Coffey, C. Casadonte-Apostolou and all CL Staff regarding Full Circle United/Bay Tek Entertainment	No Objection	
AP	Email thread between P. Coffey, P. Thanasides, CC A. Fisher and D. Timm regarding Bay Tek/Full Circle	No Objection	
AQ	Email thread between Johanna R. Goldblatt (ESPN) and E. Pavony regarding NSBL 1+ ESPN Deal Points (FCU000010028-FCU000010038)	No Objection	
AR	Website Printout: Scoreboards and Full Circle Magazine Covers (BT0000070-BT0000091)	No Objection	
AS	Email with attachment from P. Coffey to P. Thanasides dated March 11, 2020 regarding Full Circle United/Bay Tek	No Objection	
AT	Facebook post by Full Circle Bar with Skee-Ball machines	No Objection	
AU	Email thread between E. Pavony and Alex Garra (American Bocce Co) regarding Great Clip on Insta! (FCU000018337-FCU000018339)	No Objection	
AV	Website Printout: Asheville Website (BT0000113-BT0000116)	Foundation; Relevance	See Objection One
AW	Website Printout: Brooklyn Website (BT0000143-BT0000148)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
AX	Website Printout: Oakland Website (BT0000168-BT0000175)	Foundation; Relevance	<i>See Objection One</i>
AY	Website Printout: Brewskeeball Products (BT0000065-BT0000069)	No Objection	
AZ	Website Printout: Hepatitis Skee Merchandise (BT0000096-BT0000098)	No Objection	
BA	Full Circle Magazine: Phillskoo Phanatics (BT0000102)	No Objection	
BB	Letter from J. Movit to Jon R. Fetterolf, Esq. dated 9/23/2020	No Objection	
BC	Website Printout: Brewskeeball-Philadelphia (FCU000020350- FCU000020352)	Foundation; Relevance	<i>See Objection One</i>
BD	Website Printout: Gainesville Website (BT0000276-BT0000282)	Foundation; Relevance	<i>See Objection One</i>
BE	Website Printout: San Francisco Website (BT0000307-BT0000324)	Foundation; Relevance	<i>See Objection One</i>
BF	Screenshots of Twiith Videos related to NSBL (BT0000426-BT0000445)	No Objection	
BG	Website Printout: Facebook Full Circle Bar Post	No Objection	
BH	Website Printout: Facebook Full Circle Bar Post	No Objection	
BI	Forensic Collection: Instagram Post--Full Circle Bar Brooklyn on Instagram: "Ahoy! Here's the Week 1 Match Schedule ya'll. Let the Fall Skeeson commence! There's still plenty of time to register for the upcoming..." (BT0010859-BT0010863)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
BJ	Forensic Collection: Instagram Post--Extra Positive Land on Instagram: "Skeeson 47 began at FCB this week, as rookie and veteran rollers got back in the Brew York Groove. Congrats to Lex-skee, Killapino and..." (BT0010864-BT0010866)	No Objection	
BK	Forensic Collection: Instagram Post--Extra Positive Land on Instagram: "We mashed. We bashed. We smashed. Halloweek in Brooklyn was spooky and kooky D Here are the Top TEAM Costumes. Please Vote for ONE of ... " (BT0010867-BT0010874)	No Objection	
BL	Forensic Collection: Instagram Post--Extra Positive Land on Instagram: "Rollers, mount up! Championship Sunday 47 is tomorrow. Here's the Championship Sunday Program, Updated BMT Bracket and Round 1 & 2 Match ... " (BT0010875-BT0010879)	No Objection	
BM	Forensic Collection: Instagram Post--Extra Positive Land on Instagram: "Post-Skeeson begins tonite in Brooklyn with The BMT #goodluck #godskeed #everyballcounts #brewskeeball" (BT0010880-BT0010883)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
BN	Forensic Collection: Instagram Post--Full Circle Bar Brooklyn on Instagram: "The Final Week of the Regular Skeeson Hath Commeth! Here are the WEEK 8 Match Schedules and some Post-Skeeson details, as we gear up for..." (BT0010888-BT0010892)	No Objection	
BO	Forensic Collection: Instagram Post--Extra Positive Land on Instagram: "Amidst the sea of flannel shirts and cider, rollers and teams posted some sweet scores on Week 3. Congrats to Torstein from Cloudy with a... ." (BT0010893-BT0010895)	No Objection	
BP	Full Circle Bar's Website - Austin Location	No Objection	
BQ	Facebook page of NSBL	No Objection	
BR	WebCapture: NSBL - Twitch	No Objection	
BS	WebCapture: About NSBL - Twitch	No Objection	
BT	WebCapture: NSBL's Schedule - Twitch	No Objection	
BU	WebCapture: NSBL's Videos- Twitch	No Objection	
BV	WebCapture: All Products - Page 2 - Spinagogue	No Objection	
BW	Website Printout: Los Angeles Website	Foundation; Relevance	See Objection One
BX	Website Printout: Los Angeles Website - Photo 1	Foundation; Relevance	See Objection One
BY	Website Printout: Los Angeles Website - Photo 2	Foundation; Relevance	See Objection One
BZ	Website Printout: Los Angeles Website - Photo 3	Foundation; Relevance	See Objection One
CA	Website Printout: Los Angeles Website - Photo 4	Foundation; Relevance	See Objection One
CB	Website Printout: Los Angeles Website - Photo 5	Foundation; Relevance	See Objection One

Ex.	Document Description	Objection	Basis for Objection
CC	Intentionally Omitted	No Objection	
CD	Full Circle United's Sixth Month Revenue Report to Bay Tek; January 1, 2016 - June 30, 2016	No Objection	
CE	Full Circle United's Sixth Month Revenue Report to Bay Tek; July 1, 2016 - December 31, 2016	No Objection	
CF	Full Circle United's Sixth Month Revenue Report to Bay Tek; January 1, 2017 - June 30, 2017	No Objection	
CG	Email thread between E. Pavony and Brooklyn World Mug regarding BK BEEB Team Sponsor (FCU000016558-FCU000016561)	No Objection	
CH	Full Circle United's Sixth Month Revenue Report to Bay Tek; July 1, 2018 - December 31, 2018 (FCU000016764-FCU000016767)	No Objection	
CI	Email from E. Pavony to D. Timm, CC H. Hampton regarding Sponsorships (FCU000002947)	No Objection	
CJ	Email with attachments from E. Pavony to H. Hampton regarding 2019 Revenue Report (July 1-December 31) (FCU000002987-FCU000002991)	No Objection	
CK	Full Circle United's Revenue Report to Bay Tek; May & June 2020; Full Circle United's Sixth Month Revenue Report to Bay Tek; January 1, 2020 - June 30, 2020 (FCU000018310-FCU000018315)	No Objection	

Ex.	Document Description	Objection	Basis for Objection
CL	Full Circle United's Revenue Report to Bay Tek; December 2020; Full Circle United's Sixth Month Revenue Report to Bay Tek; July 1, 2020 - December 31, 2020 (FCU000003041-FCU000003045)	No Objection	
CM	Full Circle United's Sixth Month Revenue Report to Bay Tek; July 1, 2021 - December 31, 2021 (FCU000020471-FCU000020475)	No Objection	
CN	Full Circle United's Sixth Month Revenue Report to Bay Tek; January 1, 2022 - June 30, 2022	No Objection	
CO	Full Circle United's 2023 Six Month Revenue Report to Bay Tek; July 1, 2023 – December 31, 2023	No Objection	
CP	Full Circle United's 2024 Six Month Revenue Report to Bay Tek; January 1, 2024 – June 30, 2024	No Objection	
CQ	Receipts for domains (FCU EXPERT 0001098-FCU EXPERT 0001120)	Relevance	It is unclear how this document relates to the remaining claims.
CR	2014 Chase Bank Statements for Full Circle United LLC (FCU000007059-FCU000007132)	Cumulative/Waste of Time; Relevance	<i>See Objection Two</i>
CS	2015-2016 Chase Bank Statements for Full Circle United LLC (FCU000007133-FCU000007212)	Cumulative/Waste of Time; Relevance	<i>See Objection Two</i>
CT	University Federal Credit Union for Eric Cooper (FCU000007679-FCU000007697)	Cumulative/Waste of Time; Relevance	<i>See Objection Two</i>

Ex.	Document Description	Objection	Basis for Objection
CU	2018-2021 Chase Bank Statements for Full Circle United LLC (FCU000005399-FCU000005546)	Cumulative/Waste of Time; Relevance	<i>See Objection Two</i>
CV	Report: Information regarding Model S Lanes/non-Skee Ball Live Lanes (FCU EXPERT 0000002-FCU EXPERT 0000004)	No Objection	
CW	Report: FCU Lane Data for Laura (FCU EXPERT 0000966)	No Objection	
CX	Eric Pavony's Amended Answers to Bay Tek Entertainment, Inc.'s First Set of Interrogatories to Eric Pavony	Relevance	<i>See Objection Three</i>
CY	Full Circle United LLC's Amended Answers to Bay Tek Entertainment Inc.'s First Set of Interrogatories to Full Circle United LLC	Relevance	<i>See Objection Three</i>
CZ	Eric Pavony's Amended Responses to Second Set of Requests for Admission of Bay Tek Entertainment, Inc.	Relevance	<i>See Objection Three</i>
DA	Plaintiff/Counterclaim Defendant Full Circle United, LLC's Amended Answers to Defendant/Counterclaim Plaintiff Bay Tek Entertainment, Inc.'s Second Set of Interrogatories	Relevance	<i>See Objection Three</i>
DB	Counterclaim Defendant Eric Pavony's Amended Answers to Defendant Counterclaim Plaintiff Bay Tek Entertainment, Inc.s' Second Set of Interrogatories	No Objection	

Ex.	Document Description	Objection	Basis for Objection
DC	Plaintiff/Counterclaim Defendant Full Circle United, LLC's Amended Answers to Defendant/Counterclaim Plaintiff Bay Tek Entertainment, Inc.'s Second Set of Interrogatories	Relevance; Prejudice; Confusion	The interrogatory asks for a legal conclusion concerning the parties contractual rights, including claims no longer in this case.
DD	Full Circle United, LLC's and Eric Pavony's Memorandum in Support of Motion for Clarification or Reconsideration	Foundation; Relevance; Hearsay	The document is a legal memorandum containing factual representations by counsel who lack personal knowledge and legal arguments not properly put before the jury.
DE	U.S. trademark registrations for the word mark for AC DC	No Objection	
DF	U.S. trademark registrations for the word mark for BEYONCE	No Objection	
DG	U.S. trademark registrations for the word mark for G.I. JOE	No Objection	
DH	U.S. trademark registrations for the word mark for PUSSYCAT DOLLS	No Objection	
DI	U.S. trademark registrations for the word mark for SHANG-CHI	No Objection	
DJ	U.S. trademark registrations for the word mark for TEENAGE MUTANT NINJA TURTLES	No Objection	
DK	U.S. trademark registrations for the word mark for RAGE AGAINST THE MACHINE	No Objection	
DL	U.S. trademark registrations for the word mark for THE FORCE AWAKENS	No Objection	
DM	U.S. trademark registrations for BUZZBALLZ marks	No Objection	
DN	U.S. trademark registrations for APEROL marks	No Objection	

Ex.	Document Description	Objection	Basis for Objection
DO	U.S. trademark registrations for the mark MILLER HIGH LIFE	No Objection	
DP	U.S. trademark registrations for the word mark for WILD TURKEY	No Objection	
DQ	USPTO Reel: 005752 Frame No. 0285 - 0289	No Objection	
DR	Email thread with attachments between E. Schadrie, T. Diedrich, G. Philippon, J. Fortunato, and M. Connell regarding Skee Ball, Inc. Trademark Portfolio Transfer; attaching Notice of Recordation and Trademark Assignment (BT0007931-BT0007941)	Relevance	
DS	Skee-Ball A True American Classic A Guide to Skee-Ball Licensing (BT0004430-BT0004445)	Foundation, Relevance	
DT	Skee-Ball Brand Guide (BT0007559-BT0007567)	Foundation, Relevance	
DU	U.S. Trademark Registration Certificates for Reg. No. 256,496 for SKEE-BALL	No Objection	
DV	U.S. trademark registrations for 8 SKEE-BALL No. 4,627,972	No Objection	
DW	U.S. Trademark Registration Certificate for 8 SKEE-BALL No. 4,627,972	No Objection	
DX	U.S. Trademark Registration Certificate for SKEE-BALL No. Reg. No. 5,429,760	No Objection	
DY	U.S. Trademark Registration Certificate for SKEE-BALL PLUS No. Reg. No. 5,499,619	No Objection	

Ex.	Document Description	Objection	Basis for Objection
DZ	U.S. Trademark Registration Certificate for SKEE-BALL LIVE No. Reg. No. 5,657,039	No Objection	
EA	U.S. trademark registrations for No. 6,389,191	No Objection	
EB	U.S. Trademark Registration Certificate for SKEE-BALL No. Reg. No. 6,520,809	No Objection	
EC	U.S. Trademark Registration Certificate for SKEE-BALL No. Reg. No. 6,912,996	No Objection	
ED	Internet Archive - Declaration of Nathaniel E. Frank-White	Foundation; Relevance; Hearsay	See Objection One
EE*	Email thread between H. Hampton, A. Heck and R. Rochetti regarding Beer Ball Operators (BT0005206-BT0005207)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
EF*	Email thread between M. Johnson and E. Schadrie and W. Jensen regarding NUC (BT0005556-BT0005557)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
EG*	Email with attachment from T. Diedrich to H. Hampton and Larry Treankler regarding NSBL Background (BT0004879-BT0004880)	Foundation; Relevance; Hearsay	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
EH	Email thread between H. Hampton and R. Rochetti regarding FCU (BT0008700-BT0008701)	Foundation; Hearsay; Relevance	The document is internal to BayTek and contains hearsay statements about which personal knowledge cannot be assumed and which are not subject to any hearsay exception.
EI	<u>Investigator Photo:</u> <u>Brooklyn-1 Intentionally Omitted</u>	<u>Authenticity; Relevance</u>	<u>See Objection Four</u>

Ex.	Document Description	Objection	Basis for Objection
EJ	Investigator Photo: Brooklyn 2 <u>Intentionally Omitted</u>	Authenticity; Relevance	<i>See Objection Four</i>
EK	Investigator Photo: Brooklyn 3 <u>Intentionally Omitted</u>	Authenticity; Relevance	<i>See Objection Four</i>
EL	Investigator Photo: Brooklyn 4 <u>Intentionally Omitted</u>	Authenticity; Relevance	<i>See Objection Four</i>
EM	Investigator Photo: Brooklyn 5 <u>Intentionally Omitted</u>	Authenticity; Relevance	<i>See Objection Four</i>
EN	Investigator Photo: Brooklyn 6 <u>Intentionally Omitted</u>	Authenticity; Relevance	<i>See Objection Four</i>
EO	Investigator Photo: Brooklyn 7 <u>Intentionally Omitted</u>	Authenticity; Relevance	<i>See Objection Four</i>
EP	Investigator Photo: Brooklyn 8 <u>Intentionally Omitted</u>	Authenticity; Relevance	<i>See Objection Four</i>
EQ	Investigator Photo: Austin 1 <u>Intentionally Omitted</u>	Authenticity; Relevance	<i>See Objection Four</i>
ER	Investigator Photo: Austin 2 <u>Intentionally Omitted</u>	Authenticity; Relevance	<i>See Objection Four</i>
ES	Investigator Photo: Austin 3 <u>Intentionally Omitted</u>	Authenticity; Relevance	<i>See Objection Four</i>
ET	Investigator Photo: Austin 4 <u>Intentionally Omitted</u>	Authenticity; Relevance	<i>See Objection Four</i>
EU [†]	Video: Chug Chanting (BT0000514)	No Objection	

[†] Exhibits EU-FT are videos of live broadcasts of Live Play matches on Twitch posted by Full Circle and Pavony (the “Videos”), as admitted in Full Circle’s and Pavony’s Interrogatory responses. During the meet and confer process for the previous Joint Pre-trial Order (ECF 238), Full Circle objected to the purportedly cumulative nature of these exhibits and requested Bay Tek limit the number of streams to be presented at trial or Bay Tek identify what portions of the streams would be used at trial. Bay Tek represented that, *inter alia*, the content, number, volume, and length of the Videos is necessary to prove the materiality of Full Circle’s breach that the Court has already found with respect to broadcasting. Moreover, given that each is a separate and discrete video, showing different content, the evidence is not cumulative. Notwithstanding, in an effort to streamline the trial and obviate the need for these objections, Bay Tek agreed that it would remove the Videos from the exhibit list contingent on stipulations regarding the Videos. Bay Tek then prepared a series of stipulations including: the number and titles of the Videos; the dates and locations of the events depicted in the Videos; the appearance of Mr. Pavony and the SKEE-BALL® mark in the Videos; the total overall length of the Videos; and the continued availability of the Videos. The parties continue to be unable to reach an agreement on stipulations. As a result, Bay Tek must include all Videos in their entirety on the list for the reasons described above. Recognizing the difficulties for trial, though, raised by the volume of Full Circle’s livestreaming, Bay Tek will attempt to elicit facts that the stipulations were intended to

Ex.	Document Description	Objection	Basis for Objection
EV	Streams: 2017 Rollers Championship	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
EW	Streams: - Lanesanity Part 1	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
EX	Streams: Lanesanity Part 2	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
EY	Streams: Lanesanity Part 3	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
EZ	Streams: 2017 Skee-Ball Championship	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FA	Streams: 2018 Hundo Derby	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FB	Streams: 2018 World Mug Part 2	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FC	Streams: Lanesanity 2	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FD	Streams: 2019 Skee-Ball National Championship Part 1	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FE	Streams: 2019 Skee-Ball National Championship Part 2	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FF	Streams: 2019 Skee-Ball National Championship Part 3	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FG	Streams: 2019 Skee-Ball National Championship Part 4	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FH	Streams: Quaranstream E01	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FI	Streams: Quaranstream E02	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FJ	Streams: Quaranstream E03	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>

establish through examination of Full Circle's witnesses. Full Circle continues to object to the introduction of these exhibits and will be moving *in limine* on this issue.

Ex.	Document Description	Objection	Basis for Objection
FK	Streams: Quarantstream E04	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FL	Streams: Quarantstream E05	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FM	Streams: Quarantstream E06	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FN	Streams: Quarantstream E07	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FO	Streams: 2019 Hundo Derby Highlights	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FP	Streams: 2019 Rollers Championship – Rnd 2	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FQ	Streams: Phoenix (ATX) vs The Alskeemist (ILM) – 2019 Rollers	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FR	Streams: Serpico (BK) vs Phoenix (ATX) – 2019 Lanesanity	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FS	Streams: Floator (ATX) vs Woody (CGN) – 2019 Rollers	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>
FT	Streams: L Train (BK) vs Texas Lanesaw Massivescore (TX) – 2019 World Mug	Cumulative/Waste of Time; Foundation; Relevance; Hearsay	<i>See Objection Five</i>

Objection One: These exhibits were downloaded from the internet. The authorship of the exhibit, when it was generated, what it depicts, whether it has been modified, and whether the author has personal knowledge any facts asserted cannot be established. To the extent authored by third parties, the document is irrelevant to the remaining claims.

Objection Two: These exhibits are lengthy bank statements. Bay Tek has identified hundreds of pages of bank statements from Plaintiff without any reference to what portions (if any) are relevant to this case. To the extent that Bay Tek intends to introduce all of Plaintiff's bank statements, that would be needlessly cumulative and a waste of time.

Objection Three: These exhibits are discovery responses containing many statements, at least some of which should not be received into evidence given the narrowed scope of the case.

Objection Four: ~~These exhibits are photographs taken of a bar and never produced in discovery. They may be admissible, but only if they can be authenticated, if the date taken can be established, and if such date shows them to be relevant to the remaining claims.~~ Intentionally Omitted.

Objection Five: These exhibits are lengthy video files, each one of over twenty-six identified by Bay Tek. To the extent the file is offered for the statements it contains, they should be specifically identified to assess whether any hearsay exception applies. Plaintiff has repeatedly requested that Bay Tek indicate the portions of the videos that they intend to play, but has been rebuffed. To the extent that BayTek intends to show the jury forty-six hours of Skee-Ball videos, that would be needlessly cumulative and a waste of time. While Bay Tek proposed a set of stipulations in lieu of offering video exhibits, the parties could not reach agreement on final language, as Bay Tek sought to characterize the videos and what was done with them rather than neutrally presenting facts that could be agreed to.